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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

August 26, 2012

Re: CG Docket No. 10-51 "Structure and Practices of Video Relay Service (VRS) Program"

Dear Secretary Dortch,

Mano a Mano is a non-profit [501(c)(3)] organization of trilingual (Spanish, English and American Sign Language) interpreters in the United States who work in communities and settings where Spanish is prevalent. Many trilingual signed language interpreters work as Communication Assistants (CAs) in VRS calls.

On behalf of the Board of Directors and membership of Mano a Mano, I would like to file a response to the December 15, 2011 Further Notice of Proposed Rulemaking as posted by the FCC. In particular, I would like to comment on the topic of Minimum Standards for VRS CAs.

In the United States, the need for trilingual (Spanish-English-ASL) interpreters has increased significantly since the 1990s. However, the use of Spanish within interpreted situations is not new. In Puerto Rico, for example, Spanish and ASL have been the target languages for signed language interpreters for multiple decades. Yet, over the years only one certification has been developed for trilingual (Spanish-English-ASL) interpreters (BEI Trilingual Certification in Texas), and it was not designed specifically for VRS settings. There currently exists no single assessment instrument for Spanish-ASL interpretation, and the current RID-NAD National Interpretation Certification (NIC) does not provide an opportunity for Spanish-English-ASL or Spanish-ASL interpreters (i.e., CAs) to demonstrate their linguistic abilities and interpretation skills.

Because of these limitations, we suggest that Spanish-English ASL VRS interpreters/CAs should be allowed to demonstrate their knowledge and skills through other mechanisms. In short, **we hold that the RID-NAD NIC should not be the only standard for measuring qualified interpreters/CAs.** If the qualification of national certification is imposed on all VRS CAs, the effect this would have on the current pool of VRS CAs who are regular users of Spanish and ASL in their interpretations could be disastrous. Eliminating these CAs from the VRS workforce would create a dearth of qualified interpreters who could work calls that require the use of Spanish or a signed language variety from Latin America.

In addition, Mano a Mano believes that Spanish-English-ASL interpreters and Spanish-ASL interpreters who serve as CAs should be given mentorship opportunities and encouraged to partner/team with linguistically qualified Certified Deaf Interpreters (CDIs) and other Deaf interpreters with appropriate skills. These teaming opportunities could improve the effectiveness of calls where special skills in varieties of visual-gestural communication are needed.

Mano a Mano is committed to working with the FCC and interpreter organizations (e.g., the Registry of Interpreters for the Deaf) to explore possible solutions to this issue. On behalf of Mano a Mano, I thank you for your support of Spanish-English-ASL, Spanish-ASL, and Deaf interpreters/CAs who work between ASL and other varieties of signed language (e.g., Latin American sign languages and other forms of visual communication that lack full linguistic features). Feel free to contact me if you have any questions or comments.

Sincerely,

David Quinto-Pozos, PhD, RID CI & CT, NIC Master
President, Mano a Mano
Assistant Professor of Linguistics
University of Texas at Austin